

ORIGINAL

**FILED**

DISTRICT COURT OF GUAM

DEC - 8 2005 *AR*

**MARY L.M. MORAN**  
**CLERK OF COURT**

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Attorneys for United States of America

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF GUAM**

11 UNITED STATES OF AMERICA, ) CRIMINAL CASE NO. 05-00039  
12 )  
13 )

Plaintiff, )  
14 )

vs. )

**GOVERNMENT'S SENTENCING  
MEMORANDUM**

15 DEANNA INGRID MORALES )  
16 a/k/a DEANNA MORALES GUERRERO, )  
17 Defendant. )  
18 )

19 The United States is seeking a substantial assistance downward departure to Level 25 based  
20 on the cooperation the defendant has provided to agents with the U.S. Immigration and Customs  
21 Enforcement. Defendant was debriefed by law enforcement agents after she entered her guilty plea  
22 on June 14, 2005. The defendant provided information about her drug trafficking activities and  
23 identified other individuals who had participated with her in such activities, including co-defendants  
24 Sean Cole and Lisa Rodriguez-Cole.

25 The defendant would have been an available witness to testify about the Coles' drug  
26 distribution activities in the event either one elected to go trial, however, no such trial was necessary  
27 since both co-defendants pleaded guilty pursuant to plea agreements.

28 For these reasons, a downward departure to Level 25, which yields a range of 57 to 71

1 months under Criminal History Category I, is appropriate and the government will recommend the  
2 minimum term under said range.

3 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of December 2005.

6 LEONARDO M. RAPADAS  
7 United States Attorney  
8 Districts of Guam and CNMI

9 By: 

10 MARIVIC P. DAVID  
11 Assistant U.S. Attorney  
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